

✓  
**HEXCEL**

**RECEIVED**

Oct 10 11 52 AM '89

September 21, 1989

INDUSTRIAL  
SITE EVALUATION  
ELEMENT

Mr. Frank D'Ascensio  
Passaic Valley Sewer Commission  
600 Wilson Avenue  
Newark, New Jersey 07105

415-829-1169

Re: Discharge of Groundwater to PVSC System from Fine Organics Corporation Facility, Lodi, New Jersey

Dear Mr. D'Ascensio:

We appreciated the opportunity to meet with you and your staff on August 23, 1989 to discuss the conditions under which a direct discharge of groundwater from the Lodi facility to the PVSC sewer system would be allowed.

Based on this meeting, we understand that:

1. It is the position of the Commission that direct discharges of groundwater from site remediation activities will not be allowed without pretreatment;
2. PVSC's primary concerns associated with the proposed direct discharge of untreated groundwater involve considerations related to flammability and the potential exposure to volatile emissions;
3. PVSC will consider expanding the existing Fine Organics Corporation sewer connection permit to include the discharge of groundwater, provided that an appropriate level of pretreatment is included in the application for discharge;
4. PVSC will not develop specific effluent limitations for the organic compounds expected to be present in collected groundwater, but will apply a technology-based approach which should reduce VOC's to levels in the low part per billion range.
5. Non-volatile organic compounds expected to be present in the discharge do not represent a concern to PVSC and will not be a factor in technology selection;
6. The Borough of Lodi will be responsible for approval of plans and specifications for the proposed industrial and storm sewer system modifications.

SDMS Document



88566



Mr. Frank D'Ascensio  
September 21, 1989  
Page Two

As discussed, we will develop a proposal for your consideration that will request expansion of the existing sewer connection permit to include the proposed groundwater discharge. The proposed groundwater treatment system will be consistent with the requirements that you have established and that are summarized above. Thank you for your assistance in this matter and please do not hesitate to contact me if you have questions or comments concerning this letter.

Sincerely,

A. William Nosil  
Corporate Environmental Engineering Manager

AWN:caw

cc: Steve Mayberry, NJDEP ✓  
Gary Straub, F.O. Corp.

885660002